

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
MIDDLE DIVISION**

In Re: LIVINGSCAPES, LLC

Debtor.

**Case No. 20-03561
Chapter 11
JUDGE HARRISON**

RESPONSE OF MILESSA THOMAS TO DEBTOR'S OBJECTION TO CLAIM

Comes now the Milessa Thomas, by and through counsel, and would submit her Response to Debtor's Objection to her Claim in the above-styled cause. In support of the foregoing, Ms. Thomas would aver and allege that the objection submitted states the following:

1. That the claim filed is contingent, unliquidated and disputed as to liability and amount.
2. That there has been no adjudication in any court as to liability or the validity of the amount.
3. Ms. Thomas would argue that due to the nature of the claim and the lack of prior litigation in state court, Ms. Thomas would anticipate this case being placed on a track similar to an adversary proceeding, including deadlines for discovery and dispositive motions as well as a trial date. The parties will likely be able to agree to a schedule prior to the scheduled hearing, but if an agreement is not reached by that date, Ms. Thomas would request the Court set those dates at that time.

WHEREFORE, PREMISES CONSIDERED, Ms. Thomas respectfully prays that the objection be denied and that appropriate scheduling dates be ordered.

Respectfully submitted,

/s/ Paul W. Moser

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have sent a copy of the foregoing document to the following, via the court's electronic case management system.

Email by Electronic Case Noticing to:

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This the 27th day of September, 2021.

/s/ Paul W. Moser

Paul W. Moser